

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454-GKF-jfj
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

**PLAINTIFF’S MOTION TO SEAL
MOTION TO COMPEL DISCOVERY AND SUPPORTING DECLARATION**

Pursuant to Local Rule 79.1, General Order In Re The Use of Confidential Information In Civil Cases (“GO 08-11”), and paragraph 2(f) of the Stipulated Protective Order (Dkt. 55), Plaintiff Video Gaming Technologies, Inc. (“VGT”), hereby requests that the Court enter an order to seal Plaintiff’s unredacted Motion to Compel Discovery (“the Motion to Compel”) and Exhibit A to the Declaration of Michael S. Sawyer in Support of Plaintiff’s Motion to Compel Discovery (“the Sawyer Declaration”) (collectively, Dkt. 104). In support of this motion, Plaintiff states the following:

1. Portions of the Motion to Compel contain information designated by Defendants as Highly Confidential Information pursuant to paragraph 2(c) of the Stipulated Protective Order (Dkt. 55).

2. Exhibit A to the Sawyer Declaration consists of email correspondence between counsel for VGT and counsel for Castle Hill Gaming (“CHG”) dated between July 8, 2018 and

July 27, 2018. This correspondence contains sensitive and proprietary trade secret information, which, pursuant to paragraph 2(c) of the Stipulated Protective Order (Dkt. 55), should be treated as Highly Confidential Information.

3. In accordance with Local Rule 79.1, GO 08-11, and the Stipulated Protective Order, Plaintiff has filed both a public, Redacted Motion to Compel, and a public, Redacted Declaration of Michael S. Sawyer in Support of Plaintiff's Motion to Compel Discovery, (collectively, Dkt. 105), as well as a sealed, unredacted Plaintiff's Motion to Compel Discovery, and a sealed, unredacted Sawyer Declaration (collectively, Dkt. 104).

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order granting sealing the Motion to Compel and Exhibit A to the Sawyer Declaration (collectively, Dkt. 104).

July 30, 2018

Respectfully submitted,

/s/ Gary Rubman

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Counsel for Video Gaming Technologies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2018, I filed the foregoing via CM/ECF, which caused the foregoing to be served on the following counsel for Defendants:

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